

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff – Judgment Creditor,

- against -

LAURENCE M. BROWN, a/k/a LAWRENCE M. BROWN
and RONALD J. MANGINI,

Defendants – Judgment Debtors,

- and -

INFINITY FARMS, LTD., SLOAN A. BROWN, SUSAN
W. BROWN, MAYLIL, INC., and JUNE A. MANGINI,

Relief Defendants – Judgment Debtors.

10 CV 5564 (MGC)

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff – Petitioner – Judgment Creditor,

- against -

BANK OF AMERICA, N.A.,

Respondent – Garnishee,

- and -

MARSHALL GRANGER & COMPANY LLC,
MARSHALL, GRANGER & CO. LLP, BROWN
SERVICES CORP., and MANGINI & COMPANY, P.C.,

Potentially Interested Parties

**NOTICE OF MOTION
OBJECTING TO
EXEMPTION CLAIMS (FED.
R. CIV. P. 69(a) AND NY
CPLR 5222-a(d) AND 5240)**

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff – Petitioner – Judgment Creditor,

- against -

JPMORGAN CHASE BANK, N.A.,

Respondent – Garnishee.

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff–Judgment Creditor–Objector,

- against -

LAURENCE M. BROWN, a/k/a LAWRENCE M. BROWN,
Defendant–Judgment Debtor–Exemption Claimant,

- and -

SLOAN A. BROWN and SUSAN W. BROWN,

Relief Defendants–Judgment Debtors–Exemption Claimants.

ECF CASE

TO: LAURENCE M. BROWN, a/k/a LAWRENCE M. BROWN
SLOAN A. BROWN
SUSAN W. BROWN
BANK OF AMERICA, N.A.
JPMORGAN CHASE BANK, N.A.

PLEASE TAKE NOTICE, that on the Declaration of John J. Graubard dated August 30,
2012, the Exemption Claims filed by Laurence M. Brown, a/k/a Lawrence M. Brown, Sloan A.

Brown, and Susan W. Brown attached as exhibit thereto, the Memorandum of Law in support, and the Proposed Order Denying Exemption Claims, and upon all papers and proceedings heretofore had or filed herein, the plaintiff Securities and Exchange Commission (the “Commission”) will move the Court, Hon. Miriam Goldman Cedarbaum, Judge, at a date and time to be set by the Court, in Courtroom 14A, Daniel Patrick Moynihan United States Court House, 500 Pearl Street, New York, New York 10007, for an order under Rule 69(a) of the Federal Rules of Civil Procedure and New York Civil Practice Law and Rules 5222-a(d) and 5240 denying the Exemption Claims and for such other and further relief as to the Court may appear just and proper.

PLEASE TAKE FURTHER NOTICE, that the Court will determine the date by which any opposing affidavits and answering memoranda shall be served on all counsel of record and unrepresented parties and the day by any reply affidavits and memoranda of law shall be served on all counsel of record and unrepresented. Courtesy copies of all papers served must be delivered directly to Judge Cedarbaum’s chambers at the time of service.

PLEASE TAKE FURTHER NOTICE, that pursuant to Rule 3.D. of Judge Cedarbaum’s Individual Practices, oral argument will be heard on the return date of this motion.

Dated: New York, New York
August 30, 2012

/s/	John J. Graubard
JOHN J. GRAUBARD	JG-4854
JACK KAUFMAN	JK-3050
PHILIP MOUSTAKIS	PM-1748

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